

## Hingtgen, Robert J

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**From:** Mark Ostrander <clasictraclayer@att.net>  
**Sent:** Saturday, January 31, 2015 10:43 AM  
**To:** Hingtgen, Robert J; Gungle, Ashley; Jacob, Dianne; Cox, Greg; Roberts, Dave; Roberts, Ron; Horn, Bill  
**Subject:** Final comments Soitec PEIR  
**Attachments:** Ostrander Solar PEIR comment1 final 012015.docx

I accidently sent the marked up copy of my comments on Friday. Attached is same document without the mark-ups for easier reading. My apologies for the error.

Respectfully submitted,  
Mark Ostrander



To: Robert Hingtgen, Ashley Gungle : cc: Supervisor Greg Cox District 1, Supervisor Diane Jacob District 2, Supervisor Dave Roberts District 3, Supervisor Ron Roberts District 4, Supervisor Bill Horn District 5, & Clerk of BOS

County of San Diego/Planning & Development Services

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The following are comments and concerns I have in regards to the Solar Projects EIR (Tierra Del Sol and Rugged) Log No.: PDS2012 3910-120005. Applicant Soitec Solar Development LLC, Tierra Del Sol Solar Farm LLC, and Rugged LLC

**Aesthetics:**

Large concentrated photo voltaic arrays and battery storage containers will diminish view shed quality and are in view along Historic Old Highway 80. This could diminish property values that were purchased and appraised for their views. In addition, this could diminish recreation and tourism to the area.

**Air Quality:**

Dust could be an issue due to winds. Dust control abatements need to be available 24/7 as once the ground is disturbed dust will be an issue as experienced on other projects, example when construction workers are off no one is available to mitigate the problem of dust during off hours.

**Biological:**

Removal of vegetation in the area could diminish fragile and endangered plant species and could lead to erosion in the project area. The project area is home to Peninsular Big Horn sheep, Quino Checker Spot butterfly, Golden Eagle, Red Tail Hawk, Harris Hawk, Tri Colored Black Bird, Mountain Lions (cougars), and Turkey Vultures. Recently, a Black Panther (Puma or Cougar) was spotted in the area of the project, and was seen by many local residents. Black Panthers are native to California and Mexico. This particular Black Panther was probably disturbed from its habitat due to the construction of Sunrise Power Link Project. The project area could create Barrier effects to these species and could diminish foraging and hunting areas. The projects abut Wilderness and Nature Conservancy lands. The projects are also within the Sonoran Desert region which is a diverse and fragile ecosystem. The region incorporates southern Arizona North to the Mogollon Rim, the southeastern corner of California drawing a line south From

Needles to Palm Springs to San Diego, the state of Sonora, Mexico, the Baja California Peninsula of Mexico, and the Gulf of California. The projects need to be studied for cumulative impacts as there are many projects that have completed or are in construction and planning stages. The cumulative effects need to be evaluated from Imperial County and San Diego County.

#### **Cultural Resources:**

The project areas are rich in prehistoric resources from pottery shards, conical mortars, flakes, cores, house pits, pictographs, and burial sites which are well-documented and recorded. McCain Valley is rich in flakes and cores which consist of quartz and obsidian used for tool making. The Kumeyaay today still go to these areas to gather resources and some still have ceremonies in the area. The area was a large gathering spot of the Tipai and Quechan people. The many archaeological sites that have been disturbed by previous projects need to be studied for the cumulative impacts, and the region needs to be studied as a whole and not individually before this history is lost or destroyed forever. As the former CalFire CEQA coordinator for the impacted area, identification and protection of cultural and historic resources were included in my job description. I can personally attest that the proposed project locations and surrounding lands are highly sensitive and rich in prehistoric resources.

#### **Geology and Soils:**

The Boulevard Jacumba area consists of granite, quartz, Julian schist, decomposed granite, volcanic rock, and sand. The soils support a fragile vegetative community which helps reduce erosion and supplies habitat for indigenous wildlife. The disturbance of the soils and geology could impact wildlife and lead to erosion. This should be studied for cumulative impacts to the area.

#### **Greenhouse Gas Emissions:**

Construction phase will contribute to short term contribution of greenhouse gases from equipment working on the project. Long-term contribution is likely from loss of vegetation which is valuable in carbon sequestration during its lifecycle. The previous ECO project under estimating the water usage and the increased truck trips hauling water was not addressed in the original EIR and there were no consequences for the increased greenhouse gasses. This could potentially be the same with this project as the same company that did the study for ECO is the same for this project. The cumulative impacts need to be studied for this area.

#### **Hazards and Hazardous Materials:**

Introducing electrical lines and other infrastructure (CPV arrays, battery storage, and Wind Turbines) would increase potential for wildfires. Studies for the area usually, state there is a low fire activity in the area; however, they do not take into account that these areas have little or no improvements or infrastructure and limited public access. The introduction of electrical lines, infrastructure, and people would increase the probability of fire starts within this area. Overhead power lines and infrastructure would reduce the effectiveness of aerial firefighting resources, causing fire commanders to alter strategy and tactics. Fires could potentially become larger. The project area is within a Wick area which during a Santa Anna event could be catastrophic and devastating to San Diego as experienced in 2003 and 2007 conflagrations. Concentrated photo voltaics also pose a hazard to firefighters as the CPV arrays cannot be shut down only the inverters are shut down and battery storage would create high voltage hazard, explosion hazard, and hazard material hazard. The CPV array, array wiring, combiners, and home runs to inverters are fully energized at high voltages as well as the battery storage. Even at night when work lights and even moonlight can generate enough energy that could potentially be dangerous or lethal to firefighters. Another concern is lighting strike and attraction that the infrastructure may impose to the area and another potential ignition source for wildland fire. The cumulative impacts need to be studied for the area. With the addition of the battery storage to the project this will create an impact to fire service as this will create a hazardous materials incident potential. In the event of an incident would trigger a Hazmat Team response. The nearest team is from San Diego City which would be several hours for a response. This would alter tactics to a stand back and wait situation. This storage would also increase the chance for fire and or explosion. The size and scale of the storage is extremely large and I was unable to find anything of this scale to compare it too. The only mitigation I see that the County asked for is a Type 6 engine. The current services available in our area cannot deal with an incident on a site of this scale without serious upgrade to personnel, equipment, and training. This will only create an additional significant burden to first responders and residents in the area. Again I reiterate that the Cumulative impacts need to be further evaluated and the County is obligated to perform due diligence when approving the project.

#### **Hydrology and Water Quality:**

The projects could substantially alter the existing drainage pattern of the site or area through alteration of the course, in a manner which will result in substantial on or off-site erosion or siltation and could substantially increase the rate or amount of surface runoff in a manner which would result in off-site flooding which could degrade water quality to Wells and Springs within the area. Furthermore, this could result in inundation by mudflows from the project areas. The project has increased the amount of water needed which could potentially impact residents water source, past history has shown that the projects greatly under estimate the amount of water needed as shown on the ECO Substation project. ECO project used over three times the amount shown in the EIR and the same company is the one that did this project projection. There was no monitoring done during the ECO project other than self-monitoring so there is no factual data to measure impacts or sustainability. The community of Boulevard and Jacumba are totally dependent on wells and springs for their water needs. I have heard county staff tell us at public meetings that historically we get a wet winter that recharge the water tables following

traditional drought cycles and my reply is that it is banking on a future event that may be a if it is a wet winter. The question also is what if it is not a wet winter as we are in an unprecedented drought in California. The definition of sustainability is that when a resource is used it remains the same as when you were not present and I cannot see how this water usage for all the projects could be called sustainable. The cumulative effect of the projects has to be studied thoroughly as water is the lifeblood of the communities.

#### **Noise:**

Noise would be an issue during construction, as has been experienced by residents during the border fence construction, which proceeded 24/7 during construction and currently experience during the ongoing construction of Sun Rise Power Link. SDG&E requested and received waivers for hours and days of work increasing residents to more noise. Inverters and appliances could also introduce noise into the area that was not present in the rural setting. This could potentially raise the ambient nighttime noise levels.

#### **Public Service:**

The area is currently served by two volunteer fire stations, which is Boulevard. Currently, the Jacumba station is staffed by CalFire personnel as San Diego Rural does not have sufficient staffing to cover the station. This has been an issue for several years. Boulevard is currently staffed with San Diego County Fire Authority volunteers from Mount Laguna. Statistically volunteer fire station staffing goes up and down. The stations could potentially be uncovered when there is a lack of sufficient and trained volunteer force and has been dark several times in 2012. There is not a paid year-round fire station in the area, the closest Paid Staff Station is CAL Fire White Star station and the next closest paid is Jacumba. Jacumba is not a permanent contract with the County and White Star is contracted by the county in the winter months. Boulevard and Jacumba stations have a large call volume already due to I 8 traversing its response area. The projects have the potential of adding more responses to the stations call volume. The projects and as well as other projects in the area, need to be studied for the cumulative impacts to the area.

#### **Recreation:**

The projects would impact recreation as people come to the area for the view, dark skies, quiet, wildlife, and hiking. The views will be tarnished by the big CPV arrays and hiking areas could be decreased due to the large amount of land used for these projects. The cumulative impacts of all the projects in the area will have a significant impact on recreation and tourism to the area. These cumulative impacts need to be studied extensively. Access routes for local and regional recreation areas will be highly impacted due to conversion of the area from scenic rural lands into concentrated industrial energy production and transmission zones.

### **Transportation:**

Construction traffic will have an impact on local roads residents and wildlife. This is currently being experienced with Sun Rise Power Link. There have been 50 or more trucks a day continuously traveling Highway 80, tractor-trailers hauling heavy equipment, water trucks, and pickup trucks. The vehicles many of them speeding and using cell phones while driving. There has been a large number of wildlife killed along the roads from construction traffic. Old Highway 80 is showing signs of disrepair because of this traffic as well as other residential roads. The roads in the project areas were not designed for this traffic use. This needs to be studied for the cumulative impacts on these roads.

### **EMF and Radio Frequency Emissions:**

This area needs to be studied and the effects of EMF and RFE on residents and wildlife. The level of exposure needs to be addressed and not taken as a single project but as a whole of all projects proposed in the area. This would show an accurate exposure level to the residents and wildlife. This needs to be studied for the cumulative impacts.

Cumulative impacts as stated in PRC Division 13 Environmental Quality Article 20

#### **15355 Cumulative Impacts**

"Cumulative Impacts" refer to two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

I implore you to take a leadership role and deny this project and not cave into the green energy mantra that is being driven politically by special interest lobbyist driven by higher profits to energy companies. If you go to NREL (National Renewable Energy Lab) website you will see what the potential residential roof top solar could produce in California. If these resources were utilized along with commercial structures California could meet it renewable mandate and far exceed it, this would also reach goals of distributive power which is more efficient. Then we would not impact un-disturb wild lands, use less water, and create more jobs that would be sustainable. Currently the big energy companies are trying to stop residential solar because they do not make as much profit as they do on large scale industrial projects so

it becomes greed and not green as the motivating factor to push these projects through. So I ask that you not be swayed by the big money, lobbyists, and big corporations and truly represent us the residents impacted by these projects and how it will alter the environment for many generations to come. We have no recourse when these projects do not do what they say in the Environmental documents or the empty promises except to take it to court. The companies know that we do not have the resources or money that they have to fight it so they know they can get away with the violations or not honoring promises. I have done my part as a citizen of this planet by putting in solar and wind at my resident we also recycle and recycle items from the local business to reduce landfill waste. Our household generates one bag a month trash the rest is recycled. This is not easy to do in our area as there is no true recycling center out here and we have to store a large load to haul into El Cajon. We have also reduce my water usage collect rain water for plants and use native species and low water plants. These are just some things we could do that would reduce our impacts and should be the focus of the efforts needed. Final comment there was not enough time to research the addition battery storage container and batch plant and more time should be allowed to study and comment on these significant add ons.

I hope you take these comments and concerns and address them to the full extent possible. If you have questions or need further clarification feel free to contact me. Thank you for your time and allowing me to participate in this process.

Regards,

Mark Ostrander

Retired Cal Fire Battalion Chief and CEQA environmental coordinator

Jacumba Resident

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